

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RICHARD and JANICE MEYER

CASE NO.

V.

DAIMLERCHRYSLER CORPORATION
GENERAL MOTORS CORPORATION
FEDERAL-MOGUL GLOBAL, INC.

NOTICE OF REMOVAL

Defendants DaimlerChrysler Corporation and General Motors Corporation (the “automobile manufacturers”) hereby give notice of the removal to the United States District Court for the Eastern District of Pennsylvania of the claims which have been asserted against them in the action captioned Richard and Janice Meyer v. AC&S, Inc., et al. now pending in the Court of Common Pleas of Philadelphia County, at No. 0206-0138. This Notice of Removal is filed pursuant to 28 U.S.C. § 1452(a), and as grounds for removal the automobile manufacturers state the following:

1. The action of which the removed claims are a part was commenced in the Court of Common Pleas of Philadelphia County.
2. The removed claims are those for personal injury or wrongful death asserted against the automobile manufacturers on the basis of alleged exposure to certain of their asbestos-containing products, including brakes and other automotive parts, manufactured for the automobile manufacturers by Federal-Mogul Global, Inc., or companies that it purchased, one or more of which is a co-defendant of the automobile manufacturers.

3. On October 1, 2001 Federal-Mogul Global, Inc. filed a voluntary petition for protection under Chapter 11 of the United States Bankruptcy Code, commencing bankruptcy case number 01-10578 (the "Federal-Mogul Bankruptcy Case") currently pending in the United States Bankruptcy Court for the District of Delaware.

4. The removed claims may be removed to this Court pursuant to 28 U.S.C. § 1452(a): (i) the removed claims are asserted in a civil action not exempt from removal; and (ii) the Court has jurisdiction of the removed claims under 28 U.S.C. § 1334. All claims asserted against the Removing Defendants are related to the Federal-Mogul Bankruptcy Case, and the continued prosecution, outcome at trial or other resolution of the claims will have an effect on the administration of the Federal-Mogul Bankruptcy Case.

5. Removal to this Court is timely pursuant to Federal Rule of Bankruptcy Procedure 9027(a)(3) in that the Federal-Mogul Bankruptcy Case was pending when the removed claims were asserted on or after October 1, 2001 and in that this notice has been filed within 30 days of receipt by one or all of the automobile manufacturers of a copy of the initial pleading setting forth the removed claims.

6. Upon removal, the proceedings with respect to the removed claims are non-core. The automobile manufacturers do not consent to entry of a final order or judgment by the bankruptcy judge to the extent the bankruptcy court is authorized to hear or determine such claims consistent with 28 U.S.C. § 157(b)(5).

7. The purpose of removal is to facilitate transfer of the removed claims to the United States District Court for the District of Delaware, the district court presiding over the Federal-Mogul Bankruptcy Case, to resolve on a consolidated basis the common threshold scientific issues

concerning whether brakes and other automotive parts cause disease. *See, e.g., In re Dow Corning Corp.*, 1995 W.L. 495978, at *2 (Bankr. E.D. Mich. Aug. 9, 1995) (personal injury tort claims transferred to bankruptcy court pursuant to 28 U.S.C. § 157(b)(5) to resolve threshold scientific issues concerning whether silicone breast implants caused disease after removal to federal court pursuant to 28 U.S.C. § 1452(a)).

8. On November 20, 2001, the automobile manufacturers filed in the Federal-Mogul Bankruptcy Case a motion pursuant to 28 U.S.C. § 157(b)(5) to transfer this and all other claims related to brakes and automotive parts for consolidated resolution of the threshold scientific issues concerning whether brakes and other automotive parts cause disease.

9. On December 10, 2001 the Honorable Alfred M. Wolin issued the attached Order provisionally transferring pursuant to 28 U.S.C. § 157(b)(5) the claims asserted against the automobile manufacturers to the United States District Court for the District of Delaware.

10. On January 3, 2002, Judge Wolin issued a letter opinion and order reiterating that all asbestos friction claims against the automobile manufacturers pending in federal courts as of December 10 had been transferred, and ordering any claims removed after December 10 transferred as well. A copy of the Order and Opinion are attached to this Notice.

11. On February 8, 2002, the Honorable Alfred M. Wolin denied the “Motions to Transfer the ‘Friction Claims’” and simultaneously remanded the friction products claims. Attached hereto is a copy of said Order.

12. However, on February 11, 2002, the United States Court of Appeals for the Third Circuit granted a Temporary Stay of Judge Wolin’s February 8, 2002 Court Order so that the matter could be considered by a three-judge panel of that court. Attached hereto is a copy of said Order.

13. The Removing Defendants file this Notice of Removal to adequately protect the interests of Removing Defendants and to facilitate transfer of these claims to the United States District Court for the District of Delaware pursuant to Judge Wolin's provisional transfer order.

14. The automobile manufacturers will comply with 28 U.S.C. § 1446(d) by promptly giving notice of the filing of this Notice of Removal to all adverse parties to the action pending in the state court and filing a copy of this Notice of Removal with the prothonotary of the Court of Common Pleas of Philadelphia County.

Respectfully submitted,

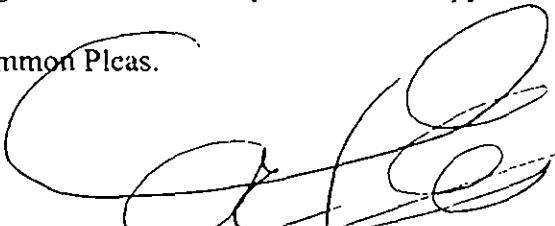
LAVIN, COLEMAN, O'NEIL, RICCI,
FINARELLI & GRAY

BY: 

Edward T. Finch, Esquire
Attorney for Defendants,
DaimlerChrysler Corporation and
General Motors Corporation

CERTIFICATE OF SERVICE

I, Edward T. Finch, Esquire, hereby certify that pursuant to 28 U.S.C. § 1446(d) written notice of the removal of this action will be promptly given to all adverse parties and a copy of the Notice of Removal will be filed with the Court of Common Pleas.



Edward T. Finch, Esquire

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: Richard and Janice Meyer
P.O. Box 414, Chevy Run Road
Lama, PA 16848

Address of Defendant: See attached List

Place of Accident, incident or Transaction: Various

(Use Reverse Side for Additional Space)

Does this case involve multidistrict litigation possibilities? Yes ☒ No ☐

RELATED CASE IF ANY

Case Number: 01-CV-5981 Judge Date Terminated: N/A

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? Yes ☒ No ☐
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court? Yes ☐ No ☒

CIVIL: (Place an ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FEIA
3. ☐ Jones Act — Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases
(please specify)-Related to Chapter 11 Filing

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases
(Please specify)

ARBITRATION CERTIFICATION

(Check appropriate category)

- I, _____, counsel of record do hereby cert
- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this case exceed the sum of \$150,000 exclusive of interest and costs;
- ☐ Relief other than monetary damages is sought.

DATE: _____

Attorney-at-Law

Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: _____

Attorney-at-Law

Attorney I.D.#

Defendants (Names and Addresses):

DaimlerChrysler Corporation
1000 Chrysler Drive
Auburn Hills, MI 48326-2766

General Motors Corporation
400 Renaissance Center
P.O. Box 400
Detroit, MI 48265-4000

Federal-Mogul Global, Inc., individually and/or as parent company, successor in interest, or indemnitor to or of:

Fel-Pro, Inc.,

Ferodo America, Inc.,

Gasket Holdings, Inc., formerly known as Flexitallic Gasket Company,

Moog Automotive Inc., formerly known as Wagner Electric Corporation,

Pneumo Abex Corp., or

T&N plc.

2655 Northwestern Highway
Southfield, MI 48034

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CASE MANAGEMENT TRACK DESIGNATION FORM

RICHARD and JANICE MEYER

CASE NO. _____

v.

DAIMLERCHRYSLER CORPORATION
GENERAL MOTORS CORPORATION
FEDERAL-MOGUL GLOBAL, INC.

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See §1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus - Cases brought under 28 U.S.C. §2441 through §2255. ()
- (b) Social Security - Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration - Cases required to be designated for arbitration under Local Civil Rule 8. ()
- (d) Asbestos - Cases involving claims for personal injury or property damage from exposure to asbestos. (X)
- (e) Special Management - Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management - Cases that do not fall into any one of the other tracks. ()

July 5, 2002

(Date)

Attorney at-law

Edward T. Finch, Esquire

Attorney for

DaimlerChrysler Corporation and General Motors Corporation

CIVIL COVER SHEET

JS44

(Rev. 12/96)

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I (a) PLAINTIFFS

Richard and Janice Meyer

DEFENDANTS
SEE ATTACHED**(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF**
(EXCEPT IN U.S. PLAINTIFF CASES)COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT
(IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED**(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)**Laurence H. Brown, Esquire
17th Floor, One Penn Square West
Philadelphia, PA 19102
(215) 569-4000ATTORNEYS (IF KNOWN)
Lavin, Coleman, O'Neil, Ricci, Finarelli & Gray
Penn Mutual Tower
510 Walnut Street - Suite 1000
Philadelphia, PA 19106
(215) 627-0303**II. BASIS OF JURISDICTION** (PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- (For Diversity Cases Only)
- | | | | | | |
|---|--------------------------------|--------------------------------|---|--------------------------------|--------------------------------|
| Citizen of This State | PTF <input type="checkbox"/> 1 | DEF <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | PTF <input type="checkbox"/> 4 | DEF <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY)

Action for personal injury for asbestos exposure against Federal-Mogul Global, Inc., or companies it purchased and removing defendants, removed pursuant to 28 U.S.C. § 1452(a).

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Motor Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	PERSONAL INJURY <input type="checkbox"/> 110 Airplane <input type="checkbox"/> 115 Airplane Product Liability <input type="checkbox"/> 120 Assault, Libel & Slander <input type="checkbox"/> 130 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med Malpractice <input type="checkbox"/> 365 Personal Injury Product Liability <input checked="" type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 442 Appeal <input type="checkbox"/> 28 USC 158 <input type="checkbox"/> 423 Withdrawal <input type="checkbox"/> 28 USC 157	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 1410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> 520 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor-Mgmt Relations <input type="checkbox"/> 730 Labor-Mgmt Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Emp'l Ret. Inc. Security Act	PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	PROPERTY RIGHTS <input type="checkbox"/> 801 HIA (139ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 OWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
				SOCIAL SECURITY <input type="checkbox"/> 861 HIA (139ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 OWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	FEDERAL TAX SUITS <input type="checkbox"/> 871 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS Third Party 26 USC 7609

VI. ORIGIN

- ☐ 1 Original Proceeding
- ☒ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Resubmitted
- Transferred from ☐ 5 another district (specify)
- ☐ 6 Multidistrict Litigation
- Appeal to District ☐ 7 Judge from Magistrate Judgment

VII. REQUESTED IN COMPLAINT:CHECK IF THIS IS A
☐ UNDER FRCP 23**CLASS ACTION**DEMAND \$
Not SpecifiedCheck YES only if demanded in complaint
JURY DEMAND ☒ YES ☐ NO**VIII. RELATED CASE(S) (See instructions) IF ANY**

JUDGE

DOCKET NUMBER 01-CV-5981

DATE July 5, 2002 SIGNATURE OF ATTORNEY OF RECORD

Edward T. Finch, Esquire

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG JUDGE _____

Defendants (Names and Addresses):

DaimlerChrysler Corporation
1000 Chrysler Drive
Auburn Hills, MI 48326-2766

General Motors Corporation
400 Renaissance Center
P.O. Box 400
Detroit, MI 48265-4000

Federal-Mogul Global, Inc., individually and/or as parent company, successor in interest, or indemnitor to or of:

Fel-Pro, Inc.,

Ferodo America, Inc.,

Gasket Holdings, Inc., formerly known as Flexitallic Gasket Company,

Moog Automotive Inc., formerly known as Wagner Electric Corporation,

Pncumo Abex Corp., or

T&N plc.

2655 Northwestern Highway
Southfield, MI 48034

CLARK HILL
ATTORNEYS AT LAW

503 Woodward Avenue
Suite 3500
Detroit, Michigan 48226-3435
Tel (313) 965-8300 ■ Fax (313) 965-8252
www.clarkhill.com

LCORF&G

JUN 14 2002
RECEIVED

Evelyn Barnes
Phone (313) 965-8287
ebarnes@clarkhill.com

June 13, 2002

VIA FEDERAL EXPRESS

Gerard Cedrone
Lavin, Coleman, O'Neil, Ricci, Finarelli & Gray
510 Walnut Street - Suite 1000
Philadelphia, PA 19106

Dear Mr. Cedrone:

Enclosed is the Complaint served on DaimlerChrysler Corporation ("DC") in the following case:

Richard and Janice Meyer v AC&S, Inc., et al., including Chrysler Corporation
Case No. 000138

Served via certified mail to DaimlerChrysler Corporation

The postmark on the envelope is June 5, 2002

The original envelope is enclosed.

The documents were received by DaimlerChrysler on June 10, 2002

Claim Number: 1095055

[Please include this Claim Number on all correspondence.]

Please email me at ebarnes@clarkhill.com within 48 hours of receipt of this letter to acknowledge receipt of the enclosed complaint.

Please defend the interests of DC in this case, consistent with the removal protocol set forth in Michael Sullivan's email correspondence dated January 3, 2002. Your law firm's services are being retained at DC approved billing rates and in accordance with the billing guidelines dated July 1, 1999.

ANSWER TO COMPLAINT: A copy of the cover letter transmitting the answer to the court and/or opposing counsel should be forwarded via facsimile to Clark Hill to my attention at 313-965-8252. A copy of the letter should be mailed to Tracy Charbonneau at Hartford. Do not send a copy of this letter to William T. McLellan. A copy of the Answer should not be forwarded to Clark Hill, DaimlerChrysler, or Hartford. If a copy of the Answer is needed, it will be requested.

CLARK HILL PLC

June 13, 2002

Page 2

CORRESPONDENCE: All correspondence regarding this case should be forwarded to Clark Hill PLC (to the attention of Michael J. Sullivan, John Berg, or Evelyn Barnes), William T. McLellan at DaimlerChrysler Corporation, and Tracy Charbonneau at Hartford.

REPORTING DUE DATES: Information regarding this and all new lawsuits should be added to your firm's quarterly survey spreadsheet report. A revised survey spreadsheet report (hard copy and computer disk) should be forwarded to Clark Hill PLC, to the attention of Evelyn Barnes, at the end of each calendar quarter [September 30, December 31, March 31, and June 30].

DOCKET ISSUES: Clark Hill should be advised immediately by email directed to asbestos@clarkhill.com of all docket issues including all trial dates, settlement conference dates, expert witness deposition dates, and company representative deposition dates. When advising CH of docket issues, please identify each matter by plaintiff and by the assigned Gallagher Bassett and/or DC claim number. In the future, only DC claim numbers will be assigned.

Clark Hill does NOT need to be notified of deposition dates for plaintiffs, treating physicians, co-workers, or persons other than expert witnesses and company representatives (which includes prior employees).

SETTLEMENT AUTHORITY: All requests for settlement authority should be directed to William T. McLellan (by email to wtm@daimlerchrysler.com or by facsimile at 248-512-4885) and Tracy Charbonneau at Hartford (by email to tracy.charbonneau@thehartford.com or by facsimile 860-547-8650) copied to Michael Sullivan (by email to msullivan@clarkhill.com or by fax at 313-965-8252). Each settlement authority request shall be accompanied by a case summary. When a case has been resolved, please send a confirming email to asbestos@clarkhill.com, wtm@daimlerchrysler.com and tracy.charbonneau@thehartford.com with instructions as to how the settlement draft should be prepared.

DISCOVERY REQUESTS: Clark Hill will be responsible for preparing an initial draft of discovery responses for your review and comment. An email should be sent to me within 24 hours of receiving any discovery request. That email should set forth the case name and number, the type of discovery request, and the due date. The written discovery request should be forwarded to Evelyn Barnes, Clark Hill PLC, 500 Woodward Avenue, Suite 3500, Detroit, Michigan, 48226, within 48 hours of receipt.

DEPOSITION ATTENDANCE: Clark Hill should be notified regarding any deposition to be held outside your state. Clark Hill will determine if other local counsel should handle the deposition, in order to minimize travel costs and fees. Clark Hill does not need to be consulted regarding depositions to be held within your state, unless they are of experts or company representatives. [The Billing Guidelines have been revised to reflect this directive.]

CLARK HILL PLC

June 13, 2002

Page 3

DEPOSITION TRANSCRIPTS: The procedure for deposition transcripts is as follows:

1. Copies of deposition transcripts should not be sent to Clark Hill PLC, DaimlerChrysler, or Hartford. Copies of the transcripts should, of course, be retained in your file.
2. If the deposition is of an expert witness or a company representative, a copy of the ASCII disk for the deposition should be sent to Clark Hill to the attention of Evelyn Barnes.
3. If a summary is prepared by the attorney who attended the deposition, a copy of that summary should be forwarded to Clark Hill.

CASE SUMMARIES/STATUS REPORTS: Case summaries and/or status reports should not be forwarded until settlement authority is sought or until such a summary is requested from your firm. When appropriate, case summaries should be emailed in Microsoft Word format to asbestos@clarkhill.com, wtm@daimlerchrysler.com and tracy.charbonneau@thehartford.com.

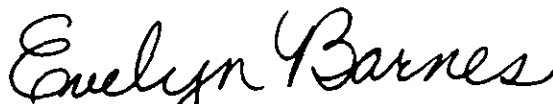
BILLINGS: Please direct all billings to Tracy Charbonneau at Hartford. Attached to each invoice should be a summary sheet with a case-by-case breakdown of fees and costs. A copy of just the summary sheet should be emailed to ebarnes@clarkhill.com or sent via facsimile to 313-965-8252 to the attention of Evelyn Barnes.

GLOBAL STRATEGIES: DaimlerChrysler wishes to manage its asbestos docket as expeditiously and cost-effectively as possible. As a result, your assistance is requested in identifying early and cost-effective approaches to individual and package settlement opportunities.

If you have any questions or concerns regarding the attached, please contact me as soon as possible.

Very truly yours,

CLARK HILL, PLC



Evelyn Barnes
Legal Assistant

EFB:ksm

Enclosures

cc: Tracy Charbonneau (w/enclosures)
c/o Benjamin Figueroa

BROOKMAN, ROSENBERG, BROWN & SANDLER

ATTORNEYS AT LAW

ONE PENN SQUARE WEST
SEVENTEENTH FLOOR
30 SOUTH FIFTEENTH STREET
PHILADELPHIA, PA 19102

TELEPHONE: (215) 569-4000
TELECOPIER: (215) 569-2222
TOLL FREE: (800) 369-0899

MELVIN BROOKMAN (1927 - 2000)

HOWELL K. ROSENBERG

LAURENCE H. BROWN

CARY L. SANDLER

JOHN M. DIDONATO**

NEIL B. KITROSSER

STEVEN J. COOPERSTEIN

DAVID B. HALPERN**

RONDA A. JAFFEE**

LEONARD F. FELDMAN **

PAUL J. RILEY

**ALSO MEMBER OF NEW JERSEY BAR

NEW JERSEY OFFICE

306 WEST SOMERDALE ROAD
VOORHEES, NJ 08043

Telephone: (856) 354-1602
Telecopier: (856) 354-9739

JOHN M. DIDONATO
NJ MANAGING ATTORNEY

RECEIVED

JUN 10 2002

OFFICE OF THE GENERAL COUNSEL

June 4, 2002

RECEIVED

JUN 12 2002

CLARK HILL

Chrysler Corporation
1000 Chrysler Drive
Auburn Hill, Michigan 48326

RE: *Richard and Janice Meyer vs. AC&S, Inc., et al*
P.C.C.P., 0206-0138

Dear Counsel:

Enclosed please find one true and correct copy of Plaintiff's Complaint for the above-captioned case, the original of which has been duly filed with the Court. Service of this Complaint is being effected under the applicable Pennsylvania Rules of Civil Procedure.

Kindly forward this Complaint to your carrier for proper response and request that they advise us if they need an extension of time to answer or otherwise plead.

Thank you for your courtesies.

Very truly yours,

BROOKMAN, ROSENBERG, BROWN & SANDLER

By:

Steven J. Cooperstein
Steven J. Cooperstein, Esquire
Attorney for Plaintiff(s)

SJC:cs
Enclosure

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

JUNE 2002

000138

PLAINTIFF'S NAME Richard and Janice Meyer		DEFENDANT'S NAME AC&S, Inc. a Pennsylvania Corporation	
PLAINTIFF'S ADDRESS P.O. Box 414, Chevy Run Road Lama, PA 16848		DEFENDANT'S ADDRESS 120 N. Lime Street Lancaster, PA 17604	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NO. OF DEFENDANTS 28	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Arbitration <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Non-Jury <input type="checkbox"/> Other: </div> <div> <input type="checkbox"/> Mass Tort <input type="checkbox"/> Savings Action <input type="checkbox"/> Petition </div> <div> <input type="checkbox"/> Commerce <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Statutory Appeals </div> <div> <input type="checkbox"/> Settlement <input type="checkbox"/> Minors <input type="checkbox"/> W/D/Survival </div> </div>		
CASE TYPE AND CODE (SEE INSTRUCTIONS) 2T T1			
STATUTORY BASIS FOR CAUSE OF ACTION (SEE INSTRUCTIONS)			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER) NONE			IS CASE SUBJECT TO COORDINATION ORDER? <div style="display: flex; justify-content: space-around;"> <div>Yes <input type="checkbox"/></div> <div>No <input type="checkbox"/></div> </div>
<p>TO THE PROTHONOTARY:</p> <p>Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant:</p> <p>Papers may be served at the address set forth below.</p>			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY Laurence H. Brown, Esquire		ADDRESS (SEE INSTRUCTIONS) One Penn Square West 30 S. 15th Street, 17th Floor Philadelphia, PA 19102	
PHONE NUMBER (215) 569-4000	FAX NUMBER (215) 569-2222		
SUPREME COURT IDENTIFICATION NO. 21174		E-MAIL ADDRESS	
SIGNATURE		DATE 5/22/02	

Court of Common Pleas of Philadelphia County
Trial Division

Civil Cover Sheet
(Supplemental Parties)

		For Prejudgment Use Only (Docket Number)	
		JUNE 2002	000138
PLAINTIFF'S NAME	Richard and Janice Meyer	DEFENDANT'S NAME	Abex Corporation a/k/a Pneumo Abex Corporation
PLAINTIFF'S ADDRESS	P.O. Box 414, Chevy Run Road Lama, PA 16848	DEFENDANT'S ADDRESS	a Delaware Corporation Liberty Lane Hampton, NH 03842
PLAINTIFF'S NAME		DEFENDANT'S NAME	Albany International Corporation.
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	1373 Broadway Albany, NY 12204
PLAINTIFF'S NAME		DEFENDANT'S NAME	Allied Signal, Inc.
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	101 Columbia Turnpike Morristown, NJ 07962
PLAINTIFF'S NAME		DEFENDANT'S NAME	Asten Hill Group, Inc. 4399 Corporate Road
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	P.O. Box 10700 Charleston, SC 29411
PLAINTIFF'S NAME		DEFENDANT'S NAME	A.W. Chesterton, INC. Middlesex Industrial Park
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	Route 93 Stoneham, MA 02180
PLAINTIFF'S NAME		DEFENDANT'S NAME	BBA Group, PLC. 1200 Century Way
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	Thorpe Park Business Park West Yorkshire, England LS15 8ZA
PLAINTIFF'S NAME		DEFENDANT'S NAME	Borg Warner Corporation
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	200 S. Michigan Avenue Chicago, IL 60604
PLAINTIFF'S NAME		DEFENDANT'S NAME	Brake & Clutch Co. of Phila.
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	7321 Crescent Blvd. Pennsauken, NJ 08110

JUNE 2002

000138

Court of Common Pleas of Philadelphia County
 Trial Division
Civil Cover Sheet
(Supplemental Parties)

		For Preliminary Use Only (Do Not Number)
PLAINTIFF'S NAME Richard and Janice Meyer	DEFENDANT'S NAME Certainteed Corporation	
PLAINTIFF'S ADDRESS P.O. Box 414, Chevy Run Road Lama, PA 16848	DEFENDANT'S ADDRESS 150 E. Sledesford Road Valley Forge, PA 19482	
PLAINTIFF'S NAME	DEFENDANT'S NAME Chrysler Corporation 1000 Chrysler Drive	
PLAINTIFF'S ADDRESS JURY FEE PAID	DEFENDANT'S ADDRESS Auburn Hill, Michigan 48326	
PLAINTIFF'S NAME	DEFENDANT'S NAME Combustion Engineering Co., INC. c/o CVCSC, Inc.	
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 175 Capital Blvd. P.O. Box 4950 Rocky Hill, CT 06067	
PLAINTIFF'S NAME	DEFENDANT'S NAME Crane Co., Demming Division	
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 1453 Allen Road Salem, OH 44460	
PLAINTIFF'S NAME	DEFENDANT'S NAME Durabla	
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 140 Sheree Blvd. Lionville, PA 19353	
PLAINTIFF'S NAME	DEFENDANT'S NAME General Motors Corporation c/o CT Corporation Systems	
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 1515 Market Street, Suite 1210 Philadelphia, PA 19103	
PLAINTIFF'S NAME	DEFENDANT'S NAME Georgia-Pacific Corporation c/o CT Corporation Systems	
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 1515 Market Street, Suite 1210 Philadelphia, PA 19103	
PLAINTIFF'S NAME	DEFENDANT'S NAME Goulds Pumps, INC.	
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 240 Fall Street Seneca Falls, NY 13148	

JUNE 2002

Court of Common Pleas of Philadelphia County
 Trial Division
Civil Cover Sheet
(Supplemental Parties)

		For Precedence Use Only (Docket Number)
		000138
PLAINTIFF'S NAME Richard and Janice Meyer	DEFENDANT'S NAME Green, Tweed & Company, Inc.	
PLAINTIFF'S ADDRESS P.O. Box 414, Chevy Run Road Lama, PA 16848	DEFENDANT'S ADDRESS 2075 Detweiler Road Kulpsville, PA 19443	
PLAINTIFF'S NAME	DEFENDANT'S NAME Maremont Corporation	
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 2400 Industrial Park Louden, TX 37774	
PLAINTIFF'S NAME	DEFENDANT'S NAME Metropolitan Life Insurance Co.	
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 1 Madison Avenue New York, NY 10010	
PLAINTIFF'S NAME	DEFENDANT'S NAME Owens-Illinois, Inc. an Ohio Corporation	
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS One Sea Gate - WMB 9 Toledo, OH 43666	
PLAINTIFF'S NAME	DEFENDANT'S NAME Pecora Corporation a Pennsylvania Corporation	
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 165 Wambold Road Harleysville, PA 19438	
PLAINTIFF'S NAME	DEFENDANT'S NAME Pennsylvania Brake Bonding	
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 9001 Torresdale Avenue Philadelphia, PA 19136	
PLAINTIFF'S NAME	DEFENDANT'S NAME Scapa Dryer Group	
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 2500 Scapa Road Waycross, GA 31501	
PLAINTIFF'S NAME	DEFENDANT'S NAME Scapa Dryer Group, INC. c/o Quintin T. Hardtner, III	
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS MidSouth Tower, 11th Floor Shreveport, LA 71101	

Court of Common Pleas of Philadelphia County

Trial Division

Civil Cover Sheet
(Supplemental Parties)

For Preliminary Use Only (Do Not Number)

JUNE 2002

000138

PLAINTIFF'S NAME Richard and Janice Meyer	DEFENDANT'S NAME Uniroyal, Inc. 70 Great Hill Road
PLAINTIFF'S ADDRESS P.O. Box 414, Chevy Run Road Lama, PA 16848	DEFENDANT'S ADDRESS Naugatuck, CT 06770
PLAINTIFF'S NAME	DEFENDANT'S NAME Weil McLain Co. Division of the Marley Company
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS Blaine Street Michigan City, IN 46360
PLAINTIFF'S NAME	DEFENDANT'S NAME Viacom/Westinghouse Electric Corp.
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 11 Stanwix Street, 2nd. Fl. Gateway 6 Pittsburgh, PA 15222-1384
PLAINTIFF'S NAME	DEFENDANT'S NAME
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS
PLAINTIFF'S NAME	DEFENDANT'S NAME
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS
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PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS
PLAINTIFF'S NAME	DEFENDANT'S NAME
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS

JUNY FEE PAID.

ATTEST

JUN 03 2002

B. PLEASANT
PRO. PROTHY

BROOKMAN, ROSENBERG, BROWN & SANDLER
BY: LAURENCE H. BROWN, ESQUIRE
ATTORNEY IDENTIFICATION NO. 21174
FIRM IDENTIFICATION NO. 9991
17TH FLOOR, ONE PENN SQUARE WEST
PHILADELPHIA, PA. 19102
(215) 569-4000

ATTORNEY FOR PLAINTIFF(S)

Plaintiff(s):

RICHARD AND JANICE MEYER
P.O. BOX 414, CHEVY RUN ROAD
LAMA, PA 16848

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
DIVISION

JUNE 2002

VS.

TERM

Defendant(s):

AC&S, INC. (001), ET AL.
A PENNSYLVANIA CORPORATION
120 N. LIME STREET
LANCASTER, PA 17604

No.

000138

ASBESTOS LITIGATION

COMPLAINT - CIVIL ACTION (2. PERSONAL INJURY)
26035 ASBESTOS

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE
One Reading Center
Philadelphia, Pennsylvania 19107
Telephone: 215-238-1701

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACIÓN DE LICENCIADOS DE FILADELPHIA
SERVICIO DE REFERENCIA E INFORMACIÓN LEGAL
One Reading Center
Filadelfia, Pennsylvania 19107
Telephone: 215-238-1701

ABEX CORPORATION (046)
a/k/a Pneumo Abex Corporation
a Delaware Corporation
Liberty Lane
Hampton, NH 03842

ALBANY INTERNATIONAL CORPORATION
1373 Broadway
Albany, NY 12204

ALLIED SIGNAL, INC. (280)
101 Columbia Turnpike
Morristown, NJ 07962

ASTEN HILL GROUP, INC. (340)
4399 Corporate Road
P.O. Box 10700
Charleston, SC 29411

A.W. CHESTERTON, INC. (127)
Middlesex Industrial Park
Route 93
Stoneham, MA 02180

BBA Group, PLC.
1200 Century Way
Thorpe Park Business Park
West Yorkshire, England LS15 8ZA

BORG WARNER CORPORATION (055)
200 S. Michigan Avenue
Chicago, IL 60604

BRAKE & CLUTCH CO. OF PHILA. (056)
7321 Crescent Blvd.
Pennsauken, NJ 08110

CERTAINTED CORPORATION (090)
750 E. Swedesford Road
Valley Forge, PA 19482

CHRYSLER CORPORATION (433)

1000 Chrysler Drive
Auburn Hill, Michigan 48326

COMBUSTION ENGINEERING CO., INC. (059)

c/o CVCSC, Inc.
175 Capital Boulevard
P.O. Box 4950
Rocky Hill, CT 06067

CRANE CO., DEMMING DIVISION

1453 Allen Road
Salem, OH 44460

DURABLA

140 Sheree Blvd.
Lionville, PA 19353

GENERAL MOTORS CORPORATION (148)

c/o CT Corporation Systems
Suite 1210
1515 Market Street
Philadelphia, PA 19103

GEORGIA-PACIFIC CORPORATION (244)

c/o CT Corporation Systems
Suite 1210
1515 Market Street
Philadelphia, PA 19103

GOULDS PUMPS, INC. (435)

240 Fall Street
Seneca Falls, NY 13148

GREEN, TWEED & COMPANY, INC. (132)

2075 Detweiler Road
Kulpsville, PA 19443

MAREMONT CORPORATION (072)

2400 Industrial Park
Louden, TN 37774

METROPOLITAN LIFE INSURANCE CO. (4019)

1 Madison Avenue
New York, NY 10010

OWENS-ILLINOIS, INC. (032)

an Ohio Corporation
One Sea Gate -WMB9
Toledo, OH 43666

PECORA CORPORATION (429)

a Pennsylvania Corporation
165 Wambold Road
Harleysville, PA 19438

PENNSYLVANIA BRAKE BONDING (074)

9001 Torresdale Avenue
Philadelphia, PA 19136

SCAPA DRYER GROUP

2500 Scapa Road
Waycross, GA 31501

SCAPA DRYER GROUP, INC.

c/o Quintin T. Hardtner, III
Midsouth Tower, 11th Floor
Shreveport, LA 71101

UNIROYAL, INC. (043)

70 Great Hill Road
Naugatuck, CT 06770

WEIL McLAIN CO. (163)

Division of The Marley Company
Blaine Street
Michigan City, IN 46360

VIACOM/WESTINGHOUSE ELECTRIC CORPORATION (099)

11 Stanwix Street, 2nd Fl., Gateway 6
Pittsburgh, PA 15222-1384

BROOKMAN, ROSENBERG, BROWN & SANDLER
BY: LAURENCE H. BROWN, ESQUIRE
ATTORNEY IDENTIFICATION NO. 21174
FIRM IDENTIFICATION NO. 9991
17TH FLOOR, ONE PENN SQUARE WEST
PHILADELPHIA, PA. 19102
(215) 569-4000

ATTORNEY FOR PLAINTIFF(S)

Plaintiff

RICHARD AND JANICE MEYER

*PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
DIVISION*

JUNE 2002

vs.

TERM

Defendant(s):

AC&S, INC., (001), ET AL.

No. 000138

ASBESTOS LITIGATION

COMPLAINT - CIVIL ACTION (2. PERSONAL INJURY)
26035 ASBESTOS

Plaintiff incorporates by reference Plaintiffs' Master Long Form Complaint In Re: Asbestos Litigation in Philadelphia Court of Common Pleas, filed as of October Term, 1986, No. 8610-0001. Pursuant to an Order dated July 30, 1986 and signed by the Honorable Richard B. Klein and the Honorable Edward J. Blake the following short form complaint is utilized in this asbestos action.

1. This Complaint involves the claims of the following persons:

a. Plaintiff:

Name: Richard Meyer

Address: P.O. Box 414
Chevy Run Road
Lama, PA 16848

Social Security No. 170-24-6553

Date of Birth: 7/27/30

b. Spouse ("Plaintiff-Spouse"):

Name: Janice Meyer

Date of Birth: 5/23/29

2. The defendants are those companies listed in the caption.

3. Plaintiffs would also name as defendants the Johns-Manville Corporation, the Johns-Manville Sales Corporation, UNARCO, Amatex Corporation, Forty-Eight Insulators Incorporated, Wallace and Gale Company, Nicolet Industries, Pacor, Inc., Delaware Insulation, Inc. f/k/a DI Distributors, Carey Canada, Celotex Corporation, Eagle Picher Industries, Inc., Keene Corporation, H.K. Porter Company, Inc., Babcock & Wilcox, and Pittsburgh Corning Corporation; however, each of these potential defendants has filed for relief or been forced into involuntary bankruptcy under Chapter 11 of the Bankruptcy Code and, pursuant to 11 U.S.C. Section 362, the institution of actions against these companies is stayed. Plaintiffs would have brought suit against the companies enumerated in this paragraph but for the automatic stay.

4. A. Defendant, **Metropolitan Life Insurance Company**, is a mutual life insurance company with a principal place of business in the New York. At all relevant times Defendant did business in the State of New Jersey and the Commonwealth of Pennsylvania. Defendant, individually and as agents of one another and as co-conspirators, aided, abetted, encouraged, counseled, assisted, agreed, and conspired among themselves and with other asbestos manufacturers and distributors to injure Plaintiffs by, among other things, providing funding for a study that revealed Canadian asbestos miners suffered from asbestosis and by materially misrepresenting that known fact, and in various other ways concealing information and otherwise preventing workers and responsible authorities from learning of the health hazards posed by asbestos exposure.

B. Defendant, **AC&S, Inc.**, formerly known as Armstrong Contracting & Supply Co., sued in its corporate capacity and as successor by purchase of the Contracting Units of Armstrong Cork Company, is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Pennsylvania, and is doing business in the Commonwealth of Pennsylvania, and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, **AC&S, Inc.**, formerly known as, Armstrong Contracting & Supply Co. and/or its predecessors, including, the Contracting Units of Armstrong Cork Company, was a manufacturer, distributor and supplier of asbestos products, including, but not limited to, products of some or all of the various other defendants named herein, which products were either directly or indirectly sold and/or supplied in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs and/or to contractors at job sites on which plaintiffs worked, when they were exposed to said asbestos products.

C. Defendant, **Albany International Corporation**, sued in its corporate capacity and as successor-in-interest to Albany Felt Company, is a corporation organized and existing under the laws of the state of Delaware, with its principal place of business in the state of New York. At all times material hereto, Albany International Corporation was doing business in the Commonwealth of Pennsylvania. At times material hereto, Albany International Corporation and/or its predecessors, manufactured, produced, distributed and/or supplied, either directly or indirectly, in the geographic area in which plaintiff worked, and/or to the employers of the plaintiff, asbestos products including, but not limited to, asbestos-containing laundry dryer felts.

D. Defendant, **Asten-Hill Group, Inc.**, is a business entity organized under the laws of the Commonwealth of Pennsylvania with its principal place of business in Pennsylvania, and is doing business in the State of New Jersey. At all times material hereto, defendant, **Asten-Hill Group, Inc.**, mined, milled, manufactured, produced, processed, supplied, distributed and sold, either directly or indirectly, in the geographical area in which plaintiff worked, asbestos products including, but not limited to, packaged or bagged asbestos, asbestos products or compounds.

E. Defendant, **BBA Friction Ltd.**, formerly Mintex U.K. is an English corporation located in West Yorkshire, England. At all times material it manufactured, produced, distributed and/or supplied, either directly or indirectly, in the geographic area in which the plaintiff worked, and/or to the employers of the plaintiff, asbestos-containing products.

F. Defendant, **Borg Warner Corporation**, is a corporation duly organized and existing under the laws of the State of Michigan with a principal place of business at 615 Griswold, Detroit, Michigan. At all times material hereto, defendant, Borg Warner Corporation, manufactured, produced and/or sold asbestos products, either directly or indirectly to the employers of plaintiff and/or its predecessors, asbestos products including, but not limited to, asbestos brake shoes, asbestos brake linings and other asbestos friction products.

G. Defendant, **Crane Co., Deming Division**, is a corporation organized and existing under the laws of the State of Ohio, with its principal place of business in Salem, OH and at all times material hereto was doing business in the Commonwealth of Pennsylvania. At all times material hereto, Defendant, Crane Co., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including but not limited to, pumps which contained asbestos materials.

H. Defendant, **Pecora Corporation**, is a Pennsylvania corporation with its principal place of business located at 165 Wambold Road, Harleysville, Pennsylvania. Pecora Corporation at all times material hereto, manufactured, supplied, distributed and/or produced any and all of the asbestos-containing products to which the plaintiff was exposed through his employment including, but not limited to, Red Devil Furnace Cement, sealings and other products.

I. Defendant, **Scapa Dryer Group**, is a corporation organized and existing under the laws of the state of Georgia with its principal place of business in the state of Georgia. At times material hereto, Scapa Dryer Group, was doing business in the Commonwealth of Pennsylvania. At times material hereto, Scapa Dryer Group, manufactured, produced, distributed and/or supplied, either directly or indirectly, in the geographic area in which plaintiff worked, and/or to the employers of the plaintiff, asbestos products including, but not limited to asbestos-containing laundry dryer felts.

J. Defendant, **Scapa Dryer Group, Inc.**, is a corporation organized and existing under the laws of the state of Louisiana with its principal place of business in the state of Louisiana. At times material hereto, Scapa Dryer Group, Inc., was doing business in the Commonwealth of Pennsylvania. At times material hereto, Scapa Dryer Group, Inc., manufactured, produced, distributed and/or supplied, either directly or indirectly, in the geographic area in which plaintiff worked, and/or to the employers of the plaintiff, asbestos products including, but not limited to asbestos-containing laundry dryer felts.

5. Plaintiff hereby incorporates by reference the following Counts from the Master Long-Form Complaint: Counts: I, II, III, IV, VI, VII & X.

6. Plaintiff's asbestos employment history including, to the extent possible at this time, the asbestos products to which plaintiff was exposed, is attached hereto as Schedule 1.

7. Plaintiff was diagnosed on or about 7/20/00 by Dr. Dominic Gaziano as having asbestosis w/ restriction as a result of exposure to asbestos.

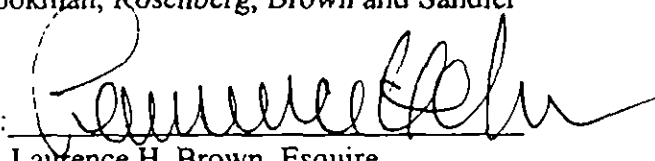
8. Plaintiff's smoking history is as follows:

Plaintiff smoked 1 pack per day from 1945 to 1963.

9. A claim for lost wages will be asserted at time of trial, if applicable.

Brookman, Rosenberg, Brown and Sandler

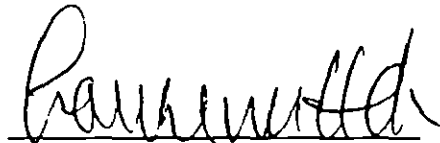
By:

A handwritten signature in black ink, appearing to read 'Laurence H. Brown', written over a horizontal line.

Laurence H. Brown, Esquire

VERIFICATION

I hereby certify that I am counsel for the plaintiff(s) in the instant matter and that the facts contained herein are true and correct to the best of my knowledge, information and belief. This statement is made subject to the penalties of 18 PA C.S.A. sec. 4904, relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read 'Laurence H. Brown', written over a horizontal line.

Laurence H. Brown, Esquire

PLAINTIFF'S ASBESTOS WORK HISTORY - SCHEDULE 1

<u>Commencement</u>	<u>Cessation</u>	<u>Employer</u>	<u>Job Description</u>
10/47	4/48	Mearl Brewer Co.	farmer
10/47	4/48	Bob Farrington & Co.	wood cutter
4/56	6/87	Hammermill Paper Co. a/k/a Lockhaven International Paper Co.	laborer
4/48	4/56	A.C. Dickey Group	mechanic
11/89	8/92	Clinton Landfill Co.	supervisor



CT System

Service of Process Transmittal Form
Philadelphia, Pennsylvania

06/20/2002

Via Federal Express (2nd Day)

TO: Gerard Cedrone
Lavin Coleman Finarelli & Gray
Penn Mutual Tower
510 Walnut Street
Philadelphia, PA 19106

RE: PROCESS SERVED IN PENNSYLVANIA

FOR General Motors Corporation Domestic State: De

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

- 1. TITLE OF ACTION:** Richard and Janice Meyer vs AC&S, Inc. et al Including General Motors Corporation
- 2. DOCUMENT(S) SERVED:** Cover Sheet, Notice, Complaint, Verification, Jury Demand, Schedule 1.
- 3. COURT:** Common Pleas Court, Philadelphia County, Pennsylvania
Case Number 000138
- 4. NATURE OF ACTION:** Asbestos litigation.
- 5. ON WHOM PROCESS WAS SERVED:** CT Corporation System, Philadelphia, Pennsylvania
- 6. DATE AND HOUR OF SERVICE:** By Process server on 06/20/2002 at 10:15
- 7. APPEARANCE OR ANSWER DUE:** Within 20 Days
- 8. ATTORNEY(S):** 215-569-4000
Laurence H. Brown, Esquire
Brookman, Rosenberg, Brown & Sandler
17th Floor, One Penn Square West
30 South 15th Street
Philadelphia, PA 19102
- 9. REMARKS:** CC sent to Rosemarie Williams at General Motors.

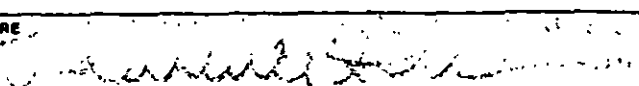
SIGNED CT Corporation System
PER Ann Marie Armstrong
ADDRESS 1515 Market Street
Suite 1210
Philadelphia, PA 19102
SOP WS 0004577488

Information contained on this transmittal form is recorded for CT Corporation System's record keeping purposes only and to permit quick reference for the recipient. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information that can be obtained from the documents themselves. The recipient is responsible for interpreting the documents and for taking the appropriate action.

JUNE 2002

000138

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

PLAINTIFF'S NAME Richard and Janice Meyer		DEFENDANT'S NAME AC&S, Inc. a Pennsylvania Corporation	
PLAINTIFF'S ADDRESS P.O. Box 414, Chevy Run Road Lama, PA 16848		DEFENDANT'S ADDRESS 120 N. Lime Street Lancaster, PA 17604 ✓	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NO. OF DEFENDANTS 28	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Petition Action <input type="checkbox"/> Transfer From Other Jurisdiction <input type="checkbox"/> Notice of Appeal	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Non-Jury <input type="checkbox"/> Other <input type="checkbox"/> Mass Tort <input type="checkbox"/> Savings Action <input type="checkbox"/> Petition <input type="checkbox"/> Concurrence <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> Settlement <input type="checkbox"/> Minors <input type="checkbox"/> W/D/Survival		
CASE TYPE AND CODE (SEE INSTRUCTIONS) 2T T1			
STATUTORY BASIS FOR CAUSE OF ACTION (SEE INSTRUCTIONS)			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER) NONE			IS CASE SUBJECT TO COORDINATION ORDER? Yes No <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant. Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY Laurence H. Brown, Esquire		ADDRESS (SEE INSTRUCTIONS) One Penn Square West 30 S. 15th Street, 17th Floor Philadelphia, PA 19102	
PHONE NUMBER (215) 569-4000	FAX NUMBER (215) 569-2222		
SUPREME COURT IDENTIFICATION NO. 21174		E-MAIL ADDRESS	
SIGNATURE 		DATE 5/22/02	

Court of Common Pleas of Philadelphia County

Trial Division

Civil Cover Sheet
(Supplemental Parties)

For Preliminary Use Only (Order Number)

JUNE 2002

000138

PLAINTIFF'S NAME Richard and Janice Meyer	DEFENDANT'S NAME Abex Corporation a/k/a Pneumo Abex Corporation
PLAINTIFF'S ADDRESS P.O. Box 414, Chevy Run Road Lama, PA 16848	DEFENDANT'S ADDRESS a Delaware Corporation Liberty Lane Hampton, NH 03842
PLAINTIFF'S NAME	DEFENDANT'S NAME Albany International Corporation.
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 1373 Broadway Albany, NY 12204
PLAINTIFF'S NAME	DEFENDANT'S NAME Allied Signal, Inc.
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 101 Columbia Turnpike Morristown, NJ 07962
PLAINTIFF'S NAME	DEFENDANT'S NAME Asten Hill Group, Inc. 4399 Corporate Road
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS P.O. Box 10700 Charleston, SC 29411
PLAINTIFF'S NAME	DEFENDANT'S NAME A.W. Chesterton, INC. Middlesex Industrial Park
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS Route 93 Stoneham, MA 02180
PLAINTIFF'S NAME	DEFENDANT'S NAME BBA Group, PLC. 1200 Century Way
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS Thorpe Park Business Park West Yorkshire, England LS15 8ZA
PLAINTIFF'S NAME	DEFENDANT'S NAME Borg Warner Corporation
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 200 S. Michigan Avenue Chicago, IL 60604
PLAINTIFF'S NAME	DEFENDANT'S NAME Brake & Clutch Co. of Phila.
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 7321 Crescent Blvd. Pennsauken, NJ 08110

JUNE 2002

000138

Court of Common Pleas of Philadelphia County

Trial Division

Civil Cover Sheet (Supplemental Parties)

For Preliminary Use Only (Docket Number)	
PLAINTIFF'S NAME Richard and Janice Meyer	DEFENDANT'S NAME Certainteed Corporation
PLAINTIFF'S ADDRESS P.O. Box 414, Chevy Run Road Lama, PA 16848	DEFENDANT'S ADDRESS 150 S. Swedesford Road Valley Forge, PA 19482 ✓
PLAINTIFF'S NAME	DEFENDANT'S NAME Chrysler Corporation 1000 Chrysler Drive
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS Auburn Hill, Michigan 48326
PLAINTIFF'S NAME	DEFENDANT'S NAME Combustion Engineering Co., INC. c/o CVCSC, Inc.
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 175 Capital BLvd. P.O. Box 4950 Rocky Hill, CT 06067
PLAINTIFF'S NAME	DEFENDANT'S NAME Crane Co., Demming Division
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 1453 Allen Road Salem, OH 44460
PLAINTIFF'S NAME	DEFENDANT'S NAME Durabla
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 140 Sheree Blvd. Lionville, PA 19353 ✓
PLAINTIFF'S NAME	DEFENDANT'S NAME General Motors Corporation c/o CT Corporation Systems
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 1515 Market Street, Suite 1210 Philadelphia, PA 19103 ✓
PLAINTIFF'S NAME	DEFENDANT'S NAME Georgia-Pacific Corporation c/o CT Corporation Systems
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 1515 Market Street, Suite 1210 Philadelphia, PA 19103 ✓
PLAINTIFF'S NAME	DEFENDANT'S NAME Goulds Pumps, INC.
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 240 Fall Street Seneca Falls, NY 13148

JURY FEE PAID

JUNE 2002

Court of Common Pleas of Philadelphia County
Trial Division

Civil Cover Sheet
(Supplemental Parties)

For Preliminary Use Only (Docket Number)

000138

PLAINTIFF'S NAME Richard and Janice Meyer	DEFENDANT'S NAME Green, Tweed & Company, Inc.
PLAINTIFF'S ADDRESS P.O. Box 414, Chevy Run Road Lama, PA 16848	DEFENDANT'S ADDRESS 2075 Detweiler Road Kulpsville, PA 19443
PLAINTIFF'S NAME	DEFENDANT'S NAME Maremont Corporation
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 2400 INDUSTRIAL PARK Louden, TX 37774
PLAINTIFF'S NAME	DEFENDANT'S NAME Metropolitan Life Insurance Co.
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 1 Madison Avenue New York, NY 10010
PLAINTIFF'S NAME	DEFENDANT'S NAME Owens-Illinois, Inc. an Ohio Corporation
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS One Sea Gate - WMB 9 Toledo, O H 43666
PLAINTIFF'S NAME	DEFENDANT'S NAME Pecora Corporation a Pennsylvania Corporation
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 165 Wambold Road Harleysville, PA 19438 ✓
PLAINTIFF'S NAME	DEFENDANT'S NAME Pennsylvania Brake Bonding
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 9001 Torresdale Avenue Philadelphia, PA 19136 ✓
PLAINTIFF'S NAME	DEFENDANT'S NAME Scapa Dryer Group
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 2500 Scapa Road Waycross, GA 31501
PLAINTIFF'S NAME	DEFENDANT'S NAME Scapa Dryer Group, INC. c/o Quintin T. Hardtner, III
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS Midsouth Tower, 11th Floor Shreveport, LA 71101

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet
(Supplemental Parties)

For Professional Use Only (Doctor Number)

JUNE 2002

000138

<small>PLAINTIFF'S NAME</small>	<small>DEFENDANT'S NAME</small>
Richard and Janice Meyer	Uniroyal, Inc. 70 Great Hill Road
<small>PLAINTIFF'S ADDRESS</small>	<small>DEFENDANT'S ADDRESS</small>
P.O. Box 414, Chevy Run Road Lama, PA 16848	Naugatuck, CT 06770
<small>PLAINTIFF'S NAME</small>	<small>DEFENDANT'S NAME</small>
	Weil McLain Co. Division of the Marley Company
<small>PLAINTIFF'S ADDRESS</small>	<small>DEFENDANT'S ADDRESS</small>
	Blaine Street Michigan City, IN 46360
<small>PLAINTIFF'S NAME</small>	<small>DEFENDANT'S NAME</small>
	Viacom/Westinghouse Electric Corp.
<small>PLAINTIFF'S ADDRESS</small>	<small>DEFENDANT'S ADDRESS</small>
	11 Stanwix Street, 2nd. Fl. Gateway 6 Pittsburgh, PA 15222-1384 ✓
<small>PLAINTIFF'S NAME</small>	<small>DEFENDANT'S NAME</small>
<small>PLAINTIFF'S ADDRESS</small>	<small>DEFENDANT'S ADDRESS</small>
<small>PLAINTIFF'S NAME</small>	<small>DEFENDANT'S NAME</small>
<small>PLAINTIFF'S ADDRESS</small>	<small>DEFENDANT'S ADDRESS</small>
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<small>PLAINTIFF'S NAME</small>	<small>DEFENDANT'S NAME</small>
<small>PLAINTIFF'S ADDRESS</small>	<small>DEFENDANT'S ADDRESS</small>
<small>PLAINTIFF'S NAME</small>	<small>DEFENDANT'S NAME</small>
<small>PLAINTIFF'S ADDRESS</small>	<small>DEFENDANT'S ADDRESS</small>

JURY FEE PAID

ATTEST

JUN 03 2002

**B. PLEASANT
PRO. PROTHY**

**BROOKMAN, ROSENBERG, BROWN & SANDLER
BY: LAURENCE H. BROWN, ESQUIRE
ATTORNEY IDENTIFICATION NO. 21174
FIRM IDENTIFICATION NO. 9991
17TH FLOOR, ONE PENN SQUARE WEST
PHILADELPHIA, PA. 19102
(215) 569-4000**

ATTORNEY FOR PLAINTIFF(S)

Plaintiff(s):

**RICHARD AND JANICE MEYER
P.O. BOX 414, CHEVY RUN ROAD
LAMA, PA 16848**

**PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
DIVISION**

JUNE 2002

JURY FEE PAID

TERM

vs.

000138

Defendant(s):

**AC&S, INC. (001), ET AL.
A PENNSYLVANIA CORPORATION
120 N. LIME STREET
LANCASTER, PA 17604**

No.

ASBESTOS LITIGATION

**COMPLAINT - CIVIL ACTION (2. PERSONAL INJURY)
26035 ASBESTOS**

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

**PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE
One Reading Center
Philadelphia, Pennsylvania 19107
Telephone: 215-238-1701**

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta presentar una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero y sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**ASOCIACIÓN DE LICENCIADOS DE FILADELFA
SERVICIO DE DEFERENCIA E INFORMACIÓN LEGAL
One Reading Center
Filadelfia, Pennsylvania 19107
Telephone: 215-238-1701**

ABEX CORPORATION (046)
a/k/a Pneumo Abex Corporation
a Delaware Corporation
Liberty Lane
Hampton, NH 03842

ALBANY INTERNATIONAL CORPORATION
1373 Broadway
Albany, NY 12204

ALLIED SIGNAL, INC. (280)
101 Columbia Turnpike
Morristown, NJ 07962

ASTEN HILL GROUP, INC. (340)
4399 Corporate Road
P.O. Box 10700
Charleston, SC 29411

A.W. CHESTERTON, INC. (127)
Middlesex Industrial Park
Route 93
Stoneham, MA 02180

BBA Group, PLC.
1200 Century Way
Thorpe Park Business Park
West Yorkshire, England LS15 8ZA

BORG WARNER CORPORATION (055)
200 S. Michigan Avenue
Chicago, IL 60604

BRAKE & CLUTCH CO. OF PHILA. (056)
7321 Crescent Blvd.
Pennsauken, NJ 08110

CERTAINTED CORPORATION (090)
750 E. Swedesford Road
Valley Forge, PA 19482

CHRYSLER CORPORATION (433)
1000 Chrysler Drive
Auburn Hill, Michigan 48326

COMBUSTION ENGINEERING CO., INC. (059)
c/o CVCSC, Inc.
175 Capital Boulevard
P.O. Box 4950
Rocky Hill, CT 06067

CRANE CO., DEMMING DIVISION
1453 Allen Road
Salem, OH 44460

DURABLA
140 Sheree Blvd.
Lionville, PA 19353

GENERAL MOTORS CORPORATION (148)
c/o CT Corporation Systems
Suite 1210
1515 Market Street
Philadelphia, PA 19103

GEORGIA-PACIFIC CORPORATION (244)
c/o CT Corporation Systems
Suite 1210
1515 Market Street
Philadelphia, PA 19103

GOULDS PUMPS, INC. (435)
240 Fall Street
Seneca Falls, NY 13148

GREEN, TWEED & COMPANY, INC. (132)
2075 Detweiler Road
Kulpsville, PA 19443

MAREMONT CORPORATION (072)
2400 Industrial Park
Louden, TN 37774

METROPOLITAN LIFE INSURANCE CO. (4019)

1 Madison Avenue
New York, NY 10010

OWENS-ILLINOIS, INC. (032)

an Ohio Corporation
One Sea Gate - WMB9
Toledo, OH 43666

PECORA CORPORATION (429)

a Pennsylvania Corporation
165 Wambold Road
Harleysville, PA 19438

PENNSYLVANIA BRAKE BONDING (074)

9001 Torresdale Avenue
Philadelphia, PA 19136

SCAPA DRYER GROUP

2500 Scapa Road
Waycross, GA 31501

SCAPA DRYER GROUP, INC.

c/o Quintin T. Hardtner, III
Midsouth Tower, 11th Floor
Shreveport, LA 71101

UNIROYAL, INC. (043)

70 Great Hill Road
Naugatuck, CT 06770

WEIL McLAIN CO. (163)

Division of The Marley Company
Blaine Street
Michigan City, IN 46360

VIACOM/WESTINGHOUSE ELECTRIC CORPORATION (099)

11 Stanwix Street, 2nd Fl., Gateway 6
Pittsburgh, PA 15222-1384

BROOKMAN, ROSENBERG, BROWN & SANDLER
BY: LAURENCE H. BROWN, ESQUIRE
ATTORNEY IDENTIFICATION NO. 21174
FIRM IDENTIFICATION NO. 9991
17TH FLOOR, ONE PENN SQUARE WEST
PHILADELPHIA, PA. 19102
(215) 569-4000

ATTORNEY FOR PLAINTIFF(S)

Plaintiff

RICHARD AND JANICE MEYER

*PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
DIVISION*

JUNE 2002

vs.

TERM

Defendant(s):

AC&S, INC., (001), ET AL

No. 000138

ASBESTOS LITIGATION

COMPLAINT - CIVIL ACTION (2. PERSONAL INJURY)
26035 ASBESTOS

Plaintiff incorporates by reference Plaintiffs' Master Long Form Complaint In Re: Asbestos Litigation in Philadelphia Court of Common Pleas, filed as of October Term, 1986, No. 8610-0001. Pursuant to an Order dated July 30, 1986 and signed by the Honorable Richard B. Klein and the Honorable Edward J. Blake the following short form complaint is utilized in this asbestos action.

1. This Complaint involves the claims of the following persons:

a. Plaintiff:

Name: Richard Meyer
Address: P.O. Box 414
Chevy Run Road
Lama, PA 16848
Social Security No. 170-24-6553
Date of Birth: 7/27/30

b. Spouse ("Plaintiff-Spouse"):

Name: Janice Meyer
Date of Birth: 5/23/29

2. The defendants are those companies listed in the caption.

3. Plaintiffs would also name as defendants the Johns-Manville Corporation, the Johns-Manville Sales Corporation, UNARCO, Amatex Corporation, Forty-Eight Insulators Incorporated, Wallace and Gale Company, Nicolet Industries, Pacor, Inc., Delaware Insulation, Inc. f/k/a DI Distributors, Carey Canada, Celotex Corporation, Eagle Picher Industries, Inc., Keene Corporation, H.K. Porter Company, Inc., Babcock & Wilcox, and Pittsburgh Corning Corporation; however, each of these potential defendants has filed for relief or been forced into involuntary bankruptcy under Chapter 11 of the Bankruptcy Code and, pursuant to 11 U.S.C. Section 362, the institution of actions against these companies is stayed. Plaintiffs would have brought suit against the companies enumerated in this paragraph but for the automatic stay.

4. A. Defendant, **Metropolitan Life Insurance Company**, is a mutual life insurance company with a principal place of business in the New York. At all relevant times Defendant did business in the State of New Jersey and the Commonwealth of Pennsylvania. Defendant, individually and as agents of one another and as co-conspirators, aided, abetted, encouraged, counseled, assisted, agreed, and conspired among themselves and with other asbestos manufacturers and distributors to injure Plaintiffs by, among other things, providing funding for a study that revealed Canadian asbestos miners suffered from asbestosis and by materially misrepresenting that known fact, and in various other ways concealing information and otherwise preventing workers and responsible authorities from learning of the health hazards posed by asbestos exposure.

B. Defendant, **AC&S, Inc.**, formerly known as Armstrong Contracting & Supply Co., sued in its corporate capacity and as successor by purchase of the Contracting Units of Armstrong Cork Company, is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Pennsylvania, and is doing business in the Commonwealth of Pennsylvania, and in the Federal Eastern District of Pennsylvania. At all times material hereto, Defendant, **AC&S, Inc.**, formerly known as, Armstrong Contracting & Supply Co. and/or its predecessors, including, the Contracting Units of Armstrong Cork Company, was a manufacturer, distributor and supplier of asbestos products, including, but not limited to, products of some or all of the various other defendants named herein, which products were either directly or indirectly sold and/or supplied in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors at job sites on which plaintiffs and/or to contractors at job sites on which plaintiffs worked, when they were exposed to said asbestos products.

C. Defendant, **Albany International Corporation**, sued in its corporate capacity and as successor-in-interest to Albany Felt Company, is a corporation organized and existing under the laws of the state of Delaware, with its principal place of business in the state of New York. At all times material hereto, Albany International Corporation was doing business in the Commonwealth of Pennsylvania. At times material hereto, Albany International Corporation and/or its predecessors, manufactured, produced, distributed and/or supplied, either directly or indirectly, in the geographic area in which plaintiff worked, and/or to the employers of the plaintiff, asbestos products including, but not limited to, asbestos-containing laundry dryer felts.

D. Defendant, **Asten-Hill Group, Inc.**, is a business entity organized under the laws of the Commonwealth of Pennsylvania with its principal place of business in Pennsylvania, and is doing business in the State of New Jersey. At all times material hereto, defendant, **Asten-Hill Group, Inc.**, mined, milled, manufactured, produced, processed, supplied, distributed and sold, either directly or indirectly, in the geographical area in which plaintiff worked, asbestos products including, but not limited to, packaged or bagged asbestos, asbestos products or compounds.

E. Defendant, **BBA Friction Ltd.**, formerly Mintex U.K. is an English corporation located in West Yorkshire, England. At all times material it manufactured, produced, distributed and/or supplied, either directly or indirectly, in the geographic area in which the plaintiff worked, and/or to the employers of the plaintiff, asbestos-containing products.

F. Defendant, **Borg Warner Corporation**, is a corporation duly organized and existing under the laws of the State of Michigan with a principal place of business at 615 Griswold, Detroit, Michigan. At all times material hereto, defendant, Borg Warner Corporation, manufactured, produced and/or sold asbestos products, either directly or indirectly to the employers of plaintiff and/or its predecessors, asbestos products including, but not limited to, asbestos brake shoes, asbestos brake linings and other asbestos friction products.

G. Defendant, **Crane Co., Deming Division**, is a corporation organized and existing under the laws of the State of Ohio, with its principal place of business in Salem, OH and at all times material hereto was doing business in the Commonwealth of Pennsylvania. At all times material hereto, Defendant, Crane Co., manufactured, produced and sold, either directly or indirectly, in the geographical area in which plaintiffs worked and/or to the employers of the plaintiffs and/or to contractors on job sites on which plaintiffs worked, asbestos products, including but not limited to, pumps which contained asbestos materials.

H. Defendant, **Pecora Corporation**, is a Pennsylvania corporation with its principal place of business located at 165 Wambold Road, Harleysville, Pennsylvania. Pecora Corporation at all times material hereto, manufactured, supplied, distributed and/or produced any and all of the asbestos-containing products to which the plaintiff was exposed through his employment including, but not limited to, Red Devil Furnace Cement, sealings and other products.

I. Defendant, **Scapa Dryer Group**, is a corporation organized and existing under the laws of the state of Georgia with its principal place of business in the state of Georgia. At times material hereto, Scapa Dryer Group, was doing business in the Commonwealth of Pennsylvania. At times material hereto, Scapa Dryer Group, manufactured, produced, distributed and/or supplied, either directly or indirectly, in the geographic area in which plaintiff worked, and/or to the employers of the plaintiff, asbestos products including, but not limited to asbestos-containing laundry dryer felts.

J. Defendant, **Scapa Dryer Group, Inc.**, is a corporation organized and existing under the laws of the state of Louisiana with its principal place of business in the state of Louisiana. At times material hereto, Scapa Dryer Group, Inc., was doing business in the Commonwealth of Pennsylvania. At times material hereto, Scapa Dryer Group, Inc., manufactured, produced, distributed and/or supplied, either directly or indirectly, in the geographic area in which plaintiff worked, and/or to the employers of the plaintiff, asbestos products including, but not limited to asbestos-containing laundry dryer felts.

5. Plaintiff hereby incorporates by reference the following Counts from the Master Long-Form Complaint: Counts: I, II, III, IV, VI, VII & X.

6. Plaintiff's asbestos employment history including, to the extent possible at this time, the asbestos products to which plaintiff was exposed, is attached hereto as Schedule 1.

7. Plaintiff was diagnosed on or about 7/20/00 by Dr. Dominic Gaziano as having asbestosis w/ restriction as a result of exposure to asbestos.

8. Plaintiff's smoking history is as follows:

Plaintiff smoked 1 pack per day from 1945 to 1963.

9. A claim for lost wages will be asserted at time of trial, if applicable.

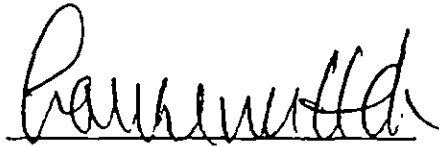
Brookman, Rosenberg, Brown and Sandler

By: 

Laurence H. Brown, Esquire

VERIFICATION

I hereby certify that I am counsel for the plaintiff(s) in the instant matter and that the facts contained herein are true and correct to the best of my knowledge, information and belief. This statement is made subject to the penalties of 18 PA C.S.A. sec. 4904, relating to unsworn falsification to authorities.

A handwritten signature in cursive script, appearing to read "Laurence H. Brown", written over a horizontal line.

Laurence H. Brown, Esquire

PLAINTIFF'S ASBESTOS WORK HISTORY - SCHEDULE 1

<u>Commencement</u>	<u>Cessation</u>	<u>Employer</u>	<u>Job Description</u>
10/47	4/48	Mearl Brewer Co.	farmer
10/47	4/48	Bob Farrington & Co.	wood cutter
4/56	6/87	Hammermill Paper Co. a/k/a Lockhaven International Paper Co.	laborer
4/48	4/56	A.C. Dickey Group	mechanic
11/89	8/92	Clinton Landfill Co.	supervisor